

“To-Be” Gap Analysis Implementation Steps

1. Gap Identification: UM Gap Number 2: Reduce Environmental Clearance Burden
2. Implementation Steps:
 - a. Step 1: Expand current BIA categorical exclusion list.
 - i. Review tribal suggestions of what specific items should be included in the expanded list.
 - ii. Provide revised list to stakeholders for informal comment.
 - iii. Conduct policy review with TESC and Solicitor Office on proposed draft regulation changes.
 - iv. Publish proposed rule change in Federal Register.
 - v. Publish final after review comments during proposed rule period.
 - b. Step 2: Issue refined policy directives and perform updates to manual and handbooks.
 - c. Step 3: Monitor the implementation of new policies.
 - d. Step 4: Delegate decision authority for environmental determinations to the lowest appropriate level.
 - i. Issue directive to delegate to lowest possible level.
 - ii. Request from Regional Directors what delegations have occurred.
 - iii. Review new possible delegations not now currently provided for by regulation and proposed new regulations to delegate additional decisions.
 - e. Step 5: Review and refine guidelines for use of environmental checklists, to eliminate performing non-applicable environmental procedures for various types of land use contract applications.
 - i. Develop tailored made checklists for each type of land use contract or activity to only trigger the relevant clearances requirement. This could be done by developing a program within the Automated leasing system that will automatically generate requirements or prompt the user for responses that generate required checklist items.
 - f. Step 6: Review potential opportunities for the tribes to provide for environmental consultation if they have relevant programs in place of external agencies such as F&WS, SHPO and Corps of Engineers. This is currently being used by certain federal agencies such as HUD on their programs on Indian lands.

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3. Dependencies on Business Processes:

Business Process Name	Process Name (As specified in “To-Be” Model)	Dependency Description
BRDM		
Predecessors	<ol style="list-style-type: none"> 1. B.6.2.1 Beneficiary Involvement for Ownership 2. B.6.2.2 Beneficiary Involvement for Land and Natural Resource Planning 3. B.6.2.3 Beneficiary Involvement for Land and Natural Resource Use & Management 	<ol style="list-style-type: none"> 1. Conveyance request for environmental clearance. 2. Wide-area or tribe-wide desires to modify or reduce burdensome environmental procedures for specified types of land use. 3. Site-specific beneficiary desires to reduce burdensome environmental procedures for a specific land use.
Successors	1. None	
FO		
Predecessors	1. None	
Successors	1. None	

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LNRP – Wide Area Plan		
Predecessors	1. P.2.2.2 Collect Pertinent Data 2. P.2.5 Issue Plan	1. Any information collected for planning, documenting difficulties or requests to alleviate environmental burdens for specific land uses. 2. Wide-area or program plan documentation depicting environmental requirements or issues with intended land use.
Successors	1. P.2.4.1 Request Environmental Clearances & DOI Approvals	1. Wide-area or tribe-wide desires to modify or reduce burdensome environmental procedures for specified types of land use.
LNRP - Appraisals		
Predecessors	1. None	
Successors	1. None	
LNRUM		
Predecessors	1. None	
Successors	1. None	
Ownership – Title		
Predecessors	1. None	
Successors	1. None	
Ownership – Probate		
Predecessors	1. None	
Successors	1. None	
Ownership - Conveyance		
Predecessors	1. None	
Successors	1. O.1.1 Receive and Review Application Request	1. Request environmental clearance for conveyance to be processed.
Ownership - Survey		
Predecessors	1. None	
Successors	1. None	

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4. Dependencies on Universal Support Functions:

Universal Support Function	Dependency Description
Automated System Requirements	1. Automated leasing system or workflow tool that has a menu driven flow that will prompt the user for land use specifics that will in turn trigger the appropriate sub-menus to answer individual and relevant requirements. For example, if the proposed lease is a transfer of an existing development, then the system will eliminated a number of NEPA type clearances already addressed during the original lease development.
Policies, Procedures and Regulations	1. Revise Departmental regulations concerning NEPA relating to BIA specific categorical exclusions. 2. Revise manuals and handbooks.
Training	1. Provide training to all staff on the revised NEPA requirements.
Records Management	1. None
Risk Assessment	1. Risk associated with a less stringent environmental requirement will require periodic monitoring.
Workforce Planning	1. None
Internal Controls / Fiduciary Security	1. None